

JIM SAXTON
THIRD DISTRICT, NEW JERSEY

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Washington, DC 20515

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May 31, 1996

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RECEIVED
JUN 18 1996

Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

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Dear Chairman Hundt:

It has come to my attention that your office has been contacted recently by Mr. Raymond W. Blackford. This letter is to follow-up on my constituent's behalf.

Mr. Blackford is concerned about a number of newer FCC regulations regarding the inspection of radio installations on large cargo ships and small passenger ships. I have enclosed a copy of his very thoughtful and articulate letter sent earlier this month directly to your office.

Please give full consideration to Mr. Blackford's thoughts and, when appropriate, respond directly to him in writing. In the interim, if you have any questions, please do not hesitate to contact my Staff Assistant, Gary Gallant, at 202-225-4765. Thank you.

Sincerely,

Jim Saxton

Member of Congress

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List ABCDE

c: The Honorable Jack Fields
Chairman, House Subcommittee on Telecommunications and Finance

REPLY TO:

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FAX MSG. # _____

TO: Hon J. Saxton Att Gary GallantFIRM: US Congress

CITY: _____

TELEFAX PHONE NO. 202-225 8244FROM: Ray BlackfordTOTAL NUMBER OF PAGES 4 INCLUDING COVER.SUBJECT: FCC NPRM CI Docket 95-55 -Large Ship Marine Radio Inspections

- ① Please see my comments to the FCC - copy follows
- ② Please consider, I've been in this business 25 years, I know exactly what it is all about. Political theory aside, I like the idea of deregulation, but this goes too far. It is a complete abdication of responsibility for public safety and compliance with international law
- ③ Imagine the furor that would follow if the recent Value Jet crash was found to have been caused by a privately done inspection that failed to uncover some glaring faults. Now imagine the storm that would hit if it was disclosed the inspection was done by a 14 year old kid, who was licensed by the US Govt to do the inspections, issue certificates etc. This could get better yet. Suppose it was disclosed the kid had never even been a passenger on a plane before and he got his license by taking a 20 min multiple choice private sector administered test.

DATE TRANSMITTED: _____ TIME TRANSMITTED: _____

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JUN 18 1996
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

Raymond W. Blackford
2214 Edgar Rd.
Point Pleasant, N.J. 08742
21 May 96

Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

Included 1 Original and 9 copies

Re: CI Docket No. 95-55

Amendment of the Commission's Rules Concerning the Inspection
of Radio Installations on Large Cargo Ships and Small Passenger Ships

Gentlemen,

Based on some 25 years experience in the large ship radio industry, I find the above captioned N.P.R.M. to be a good idea that is long overdue. However, I also find that it is seriously defective in several respects:

1. The proposal is wholly dependent on the present licensing structure. Nothing in the present licensing structure provides for the evaluation of the individual's honesty, integrity, or soundness of judgment. These are all important attributes for any inspector.
2. Nothing in the present licensing structure deals even remotely with performance standards, methodology, or quality assurance procedures for carrying out inspections.
3. Based on my own experience as an engineer and as a manager in this industry, I am of the opinion that the technical ability required to obtain any grade of operator's license is just barely adequate to insure competence as an operator. It is inadequate to insure competence as a technician, and it is totally insufficient to guarantee minimal competence as a radio inspector.
4. Since the technician, or his employer, will be retained by the shipping company, neither of them is sufficiently independent to insure an honest and impartial inspection. There will always be the implied threat that if you want repeat business, you'd better go easy on us.
5. Virtually every other administration has the class society issue the Safety Certificate, based on the recommendation of the technician. With the inception of ISO 9000 standards, the technician and company must be on an approved list, maintained by the class society.
6. While it is obvious that the privatization of small boat inspections has been successful, it is very risky to extrapolate this success into the large ship market. They are really two totally different industries with radically different practices, operating procedures, equipments, and requirements. They are similar only in name.
7. As presently written, the N.P.R.M. would permit a teenager who managed to memorize a license manual and pass a multiple choice test to be a Radio Inspector and issue Radio Safety Certificates on behalf of the United States. Theoretically, there is no requirement that this person ever have seen a ship, a ship's radio station, or for that matter even have seen the ocean before.

Clearly this is a gross abdication of the commission's responsibility for maintaining public safety. It is an invitation to irresponsible behavior, corruption and possible disaster.

8. I suggest that this deficiency can easily be corrected by changing the proposed qualifications to be a radio inspector. I would suggest they include the following:

- A. Minimum age 30.
- B. A minimum of 10 years successful experience in the repair of large vessel radio, radar and general electronics should be required.
- C. A minimum of an A.S.E.E. degree or equivalent training should be required.
- D. Certification or documented acceptance by atleast 2 major Class Societies should be required.
- E. A separate certification structure should be established that is less dependent on operator licensing. There is no reason to require the inspector to be a Morse Operator. Many of the commission's own inspectors can't copy morse, to any useful degree. Passing the technical examination required for each class of vessel, should be sufficient.
- F. Individual radio companies should be certified much the same way as the F.A.A. certifies aviation shops.

Since the number of shops and individuals who would be involved in this process would be relatively small and most of those involved in this field are already well known to commission personnel, the burden on the government would be minimal and of short duration. There are probably less than 200 qualified individuals who are seriously involved in this field nation wide. Movement of qualified individuals into this field would also be minimal, so there would be no significant on going burden of the government.

I believe privatizing radio inspections is definitely the best thing to do. However, we should at least maintain standards at least as rigorous as those maintained by the "Flag of Convenience" states, as represented by the various Class Societies.

Yours truly


Raymond W. Blackford